

UNITED STATES DISTRICT COURT

OCT 15 2018

for the

District of GuamJEANNE G. QUINATA
CLERK OF COURT

Division

Case No.

18-00038

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☒ NoWashington D.C. Seattle city
Manufacturing Inc.
Jaydeen Catherine De la Cruz
Plaintiff(s)(Write the full name of each plaintiff who is filing this complaint.
If the names of all the plaintiffs cannot fit in the space above,
please write "see attached" in the space and attach an additional
page with the full list of names.)

-v-

Bank of Guam Santa Cruz Branch
Bank Pacific Aspinall Lang Hagatna
Bank of Hawaii Hagatna Branch
Defendant(s)(Write the full name of each defendant who is being sued. If the
names of all the defendants cannot fit in the space above, please
write "see attached" in the space and attach an additional page
with the full list of names.)

First Hawaiian Bank Maite Branch

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Jaydeen Catherine De la Cruz
#122 Santa Rosa Ave.
Hyundai
Santarita Guam, 96915
671-565-2861 / 7517
jaydeendelaacruz27@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Bank of Guam
Jesus Leon Guerrero
Head Quarters
Hagatna
Guam, 96932
671-472-1348

Defendant No. 2

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Bank Pacific
Supervisor
Hagatna Branch
Aspinall Lane
Guam, 96932
671-479-5356

Defendant No. 3

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Bank of Hawaii
Supervisor Micheal
Hagatna Branch
Hagatna Gu, 96932
671-472-9852

Defendant No. 4

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

First Hawaiian Bank
Supervisor Mr. William S
Maite Branch
Gu, 96932
671-472-9878

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

- ☐ Federal question ☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Discrimination, Fair Labor Standards,
civil rights, Injunction.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Jaydeen Catherine Delacruz, is a citizen of the
State of (name) Guam.

b. If the plaintiff is a corporation

The plaintiff, (name) Jaydeen Catherine Delacruz, is incorporated
under the laws of the State of (name) Guam,
and has its principal place of business in the State of (name)
Guam.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) Bank of Guam, is a citizen of
the State of (name) Guam. Or is a citizen of
(foreign nation) Guam, Saipan

b. If the defendant is a corporation

The defendant, (name) NFCU Navy Federal Credit Union, is incorporated under
the laws of the State of (name) Guam, and has its
principal place of business in the State of (name) Guam.
Or is incorporated under the laws of (foreign nation) Virginia,
and has its principal place of business in (name) Guam.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$980,000.00 Because of NSF on
Checking Account, and delay of
timing to make deposit to checking
Account.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Too much bothering of checking Account.
Always disrupting sessions. can't concentrate
with work very discriminative, and just not
following rules. By depositing money into
account effectively and efficiently.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Defendant is to process payment of claims
immediately. and do not touch anything
can't touch anything of plaintiff valueables.
to stop harrasing and is able to come in
Bank to pick-up payment.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10.15.2018

Signature of Plaintiff

Printed Name of Plaintiff

Jayleen Catherine Delacruz
Jayleen Catherine Delacruz

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Attorney at Law Jaydeen Catherine Dela Cruz
P.O. Box 5484 Hagatna Guam, 96932
671-477-9866 (office) 671-477-9867 Fax
671-689-8495 (cell)

IN THE UNITED DISTRICT
COURT OF GUAM

Pro se

Washington D.C. Seattle Manufacturing, Inc. **CIVIL ACTION NUMBER CV-0025-04**
Jaydeen Catherine Dela Cruz
Senator through Legislature (Guam)

Plaintiff,

Vs.

RE: Civil Action

Bank of Guam Santa Cruz Branch Does 1-10
Bank Pacific Aspinall Ave, Hagatna Guam, 96910
First Hawaiian Bank P.O. Box 3200 Honolulu, Hi, 96847
Bank of Hawaii Hagatna Guam, 96932 2nd Floor of B.O.H. Bldg.

Date: September 05, 2018

To: NSF Corporation
52 S. First Street
St. Louis, MO

I Jaydeen Catherine Dela Cruz whom is currently a Senator through the Legislature for the Government of Guam; and is also known to be commissioner for Local Gov. of Guam authority Herein, Incorporated. Jaydeen is demanding for payment of Champaign Funds. Your accounts are delinquent in the amount of: \$980 Nine Hundred Eighty Zillion Hundred Thousand Dollars. Please be advised that that in the event we do not receive payment in full with 14 Days of the date of this notice, we will initiate collection proceedings against you without further notice. If such proceedings are initiated, you will also be responsible for pre-judgment interest, attorney's fees, court fees, and any and all other costs of collection. Collection proceedings may also adversely affect your credit rating.

If full payment has already been sent, please disregard this notice.

[PLEADING TITLE] - 1

1 Please contact the undersigned if you have any questions.

2 Jaydeen Catherine DelaCruz **Senator Though the Legislature (Guam)**
3 **Notice of Assignment of Account for Collection**
4

5 **Date: September 06, 2018**
6

7 To: NSF Corporation
8 52 s. First Street
9 St. Lois, Mo
10

11 Please be advised that your delinquent account has been assigned for collection to the
12 following collection agent: Debt. Collection Associates, Inc. 415 Strongarme Street, St. Louis,
13 Mo. The amount assigned is based upon the following amounts(s):

14 \$980 Nine Hundred Eighty Zillion Hundred Thousand
15 Dollars representing the amounts owed for goods.
16 Delivered pursuant to contract date June 15, 2017.
17 Plus accrued interest.
18

19 Please contact the above-mention collection agent regarding this notice and all future payments
20 on this account.
21

22 Jaydeen Catherine Dela Cruz
23 **Commissioned**
24 **U.S. Senator though the Legislature (Guam)**
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[PLEADING TITLE] - 2

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5 The complaint of The Plaintiff, Washington D.C. Seattle, Manufacturing, Inc. / Jaydeen
6 Catherine Dela Cruz respectfully shows and alleges as follows:
7

8 1. The plaintiff herein, Washington D.C. Seattle; Manufacturing Inc. / Jaydeen
9 Catherine Dela Cruz , is a resident of the State Washington D.C. Seattle. Ms. Jaydeen Catherine
10 Dela Cruz resides at #222 Hyundai, Santa Rita Guam, 96915.

11 2. The Defendant herein, Bank of Guam; Bank Pacific; Bank of Hawaii; First
12 Hawaiian Bank has a principle place of business at Guam, Defendant is engaged in the business
13 of building Political Affairs.

14 3. Plaintiff Washington D.C. Seattle, Manufacturing Inc. / Dela Cruz desired to have
15 General Office space and room for real property Located in Hagatna area and to occupy space
16 pursuant to a design prepared by her. She and the Defendant discussed her needs and
specifications for this project in Political Affairs.

17 4. On September 07, 2017, Plaintiff and Defendant entered into a written agreement.
18 Pursuant thereto, Plaintiff agreed to pay the sum of \$5,500, 000.00 for the General Office space
19 and a P.O.V. Private owed vehicle. Plaintiff was obligated to make a down payment of
20 \$900,000.00 on or before September 07, 2017, with the Balance to be due upon delivery of the
21 General Office Space and the P.O.V. her private owed Vehicle. The Defendant agreed to open
22 the office space and make room for her real property and private owed vehicle, with the
23 Plaintiffs design of her political matters. For the aforesaid price and to complete the work and
deliver the office space and private owned vehicle; on or before December 12, 2017.

24 5. On September 07, 2018, Plaintiff delivered to Defendant a certified check in the
25 Sum of \$5,500, 000.00, which Defendant cashed.

26 6. Defendant failed to deliver the office space on or before September 07, 2017, as
27 agreed. Plaintiff made numerous phone calls and sent several letters to Defendant about the
28 contract, but received no response.

29 7. By reason of the facts and circumstances stated above, Defendant has breached
30 the contract.

31 8. By reason of the facts and circumstances stated above, Plaintiff has been
32 damaged by the Defendant in the sum of \$ 73,500,000,000.00

[PLEADING TITLE] - 3

9. By reason of the facts and circumstances stated above, Plaintiff has been injured and entitled to

Her real property and should be compensated for actually punitive monetary relief and that the Defendant owes the sum of money to the Plaintiff in the amounts of \$980 Zillion hundred Thousand Dollars.

10. By reason of the facts and circumstances stated above, the Plaintiff hereby, orders s that this case be dismissed. Then, she orders though the court U.S. District courts of Guam same as a court order. Pursuant to the Defendant in the opening of a new Account and with check writing privileges' should then be continued, with the Bank of Guam; Bank pacific; Bank of Hawaii and The First Hawaiian Bank. The Plaintiff, clearly states that she has to Re-establish Committee to Elect Account. And or before when in possession of a checking and savings secured membership. She agrees into an offer of an agreement though a Local Trust to withdraw money in such accounts and though a "General Trust Funds" to be closed. And then free and clear of all check writing privileges'. For her committee to elect Champaign Treasure opinions though her Political Affairs workforce and in Local Government Authority Act.

11. By reason the facts and circumstances stated above, the Plaintiff has been servicing Guam time to time for a form of War Reparation though out the Pacific. Pursuant to the Local Government Authority Act that the Plaintiff, clearly states that any Individual or Corporation incorporated under the U.S. Territories and is incorporated in Guam and conduct Business In Guam is entitled to non- Racial Discriminative Citizenship and then be release from any criminal activities on-going at this present time. Is opposing a war reparation history be hide the scenes. The Federal and State laws prohibits Discrimination against certain protected groups in Businesses and place that are considered "Public Accommodations" which means to her entitlement of Senator though the Legislature for the Public to receive a Freedom of Choice / Freedom of Human Society, when government is at issue.

-Government –owned / operated facilities, services, and building
- Privately –owned / operated businesses, services, and buildings.

12. By reason the facts and circumstances stated above, the Plaintiff has been awaiting a period of time and is seeking monetary damages a.s.a.p. The plaintiff is entitled to a monetary relief and punitive injures. Herein, Granted to her. She is asking the court to order that all her debts. Owed be free and cleared. Then, receive her monetary damages for the relief of her value and get the entire Trust Jumbo Money Market Checking account cleared. And then order to permit her presents, and to enter through the Banks at no risk. Then she must provide proper documents for her banking needs though her Senatorial Champaign this upcoming election 2018Which is the General Election. To process her paper works to the best of her knowledge and pay-out her relief of a Government Official Senator Jaydeen Catherine Dela Cruz to assigns her banking representative her Salary be a ACH Wire Transfer to her account Domestically instantaneously same a account. Direct Deposit of her payroll check income. Same account their them, to pull a bank wire from bank of Guam; bank pacific; bank of Hawaii, first Hawaiian bank. Through her commissioned earnings everyday at the D.O.A. Government of Guam, and to keep her title as a Senator for the Legislature with –holding her

[PLEADING TITLE] - 4

earnings at \$180,000.00 One hundred and Eighty Thousand Dollars annually be paid to her in cash immediately. And then a Salary increase of \$ 180, 000.00 again One Hundred Eighty Thousand Dollars. Then rounded off to a total amount of \$360, 000.00 annually. On this day of the 12th of September, 2018. Her gratitude is greatly appreciated.

13. By reason the facts and circumstances stated above, the plaintiff is now ordered to receive her money and clothing, house, and car and food for entitlement of her relief. That she has rights as a minor, Children should have legal rights under the federal law she is entitled to benefits living with both parents then to receive some kind of child support. And inheritance since the time of her birthday in 1983 to present. Parents shall support their children by obligation rests equally with both parents. Then, create a lien for the obligators property.

Executed on this day of the 12th September, 2018.

Jaydeen Catherine Dela Cruz
Commissioned as a
U.S. Senator though the Legislature (Guam)

1 Attorney at Law Jaydeen Catherine Dela Cruz
2 P.O.Box 5484
3 Hagatna Guam, 96928
4 671-477-9866 671-477-9867

5 **IN THE UNITED STATES**
6 **DISTRICT COURT OF GUAM**

7 *Pro Se*

8 **Washington D. C. Seattle City Manufacturing Inc.,)**
9 **Jaydeen Catherine Dela Cruz**

Civil Case CV-0026-06

10 **RE: Judgment in a Civil Action**

11 Plaintiff,

12 Vs.

13 **Bank of Guam Santa Cruz Branch Does 1-10,)**
14 **Bank Pacific Aspinall Lane Hagatna)**
15 **Bank of Hawaii 2nd Floor of B.O.H. Bldg.)**
16 **First Hawaiian Bank Maite Branch)**
17 Defendants,

18 I, Jaydeen Catherine Dela Cruz, declare that I am a Senator through the Legislature
19 Appointed by the U.S. District Court of Guam and the Local Government Authority.

20 , and that I am currently with the Government of Guam serving Guam's people. As a Senator through
21 the Legislature of Government Authority.

22 , and that I serve a "Summons, Verified JUDGEMENT IN a CIVIL ACTION" upon

23 ""upon Bank of Guam Santa Cruz Branch , Bank Pacific Aspinall Drive Hagatna Guam, Bank of
24 Hawaii 2nd Floor Hagatna Branch, and the First Hawaiian Bank Maite Branch. 26th day of September,
25 2018, at

26 the hour of _12____: _00__p.m.

27 I Jaydeen Catherine Dela Cruz am also known to commission for our Local Government and of the
28 Federal Government of Guam authority. I am **demanding** for payment for Campaign Funds to be
29 release. Your account have been delinquent since April 12, 2017. In the amounts of \$980 Nine
30 Hundred Eighty Hundred Zillion Thousand Dollars. Where the cause of action is based on
31 fraud, or the right of action is concealed by fraud and certain personal injuries actions. Please be advised
32 that in the event we do not receive payment in full within 7 days of the date of this notice we will initiate
collection proceedings against you without further notice. The plaintiff Washington D.C. Jaydeen
Catherine Dela Cruz President recovers nothing from the Defendant Bank of Guam, Bank Pacific, and

[PLEADING TITLE] - 1

1 Bank of Hawaii. First Hawaiian Bank. The amount of \$980 Hundred Zillion Thousand Dollars, which
2 includes prejudgment interest at the rate of 33% plus post judgment interest at the rate of 33% per annum,
3 along with costs. Collection proceeding may also adversely affect your credit rating. Stand, for relief in
4 exclusive of all of credit cards from any bank in a minimum charge of \$387 Three Hundred and Eighty
5 Billion Hundred Thousand Dollars. Should go to her towards her credit cards account immediately. Please
6 make sure that you secure these credit cards and that they are in good standing and could be activated for
7 these accounts 1. A Gold or Platinum Visa / MasterCard From any bank for a minimum charge amount of
8 \$950,000.00 no limit credit card to be access immediately. 2. Please process payment for Ms. Jayden
Catherine Della Cruz so that she could get access to the funds and make charges a.s.a.p. for the payment
of her Champaign Funds to be release immediately.

9
10
11 Executed on the 26th day of September 2018.

12 Signed received: _____ Signed by: **Jaydeen Catherine Dela Cruz**

13
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16 Answer due date: 5 days from above date: _____

17 Time: N/A

Jaydeen Catherine Dela Cruz
Attorney at Law

18
19 I declare under penalty of perjury that the aforementioned statement is true and correct to the
20 best of my knowledge and belief.
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[PLEADING TITLE] - 2

1 We act the above-mentioned Company, which is in the retail business of selling children's Toys,
2 electronic devices, computers and battery operated merchandises and name brand toys like alike,
3 Fisher Prince, and bikes for toddlers, Cabbage patch kids Barbie Dolls, Brats and Monster High
4 Dolls, Hello Kitty stationary and Marvel Toys with play ground legends.

5 We instructed that you are in-debt to our client in the sum of \$980,000.00 being the balance of
6 purchase price of a new space area within length of 2600 sq. feet and real estate property under
7 commercial agreement for lease in the amount of \$2.5 million dollars for purchase out right. \$5.5
8 Million which you obtained from our client on the 1st of December 2017. Which was delivered to
9 you at that time of enclosed.

10 We are instructed that in spite of numerous remainders, you have failed to pay. Unless payment
11 of the full balance made via this office, within 7 days from the date of this letter, court
12 proceeding will be commenced against you for the outstanding sum together with interest and
13 costs.

14 Special damages:

15 Out-of-the-pocket expenses and

16 Economic loss

17 Incidental damage to property eg ruined clothing, broken wrist-watch, and damage to a motor
18 vehicle.

19 Medical expenses. All reasonable Doctors fees and prescription charges can be removed.

20 Cost of paid help such nursing care.

21 Pain and suffering. This refers to physical pain and emotional and mental suffering caused by the
22 injury.

23 Loss of amenity. This compensates the plaintiff for the lost or reduced enjoyment of life.
24 This loss may be general, for example, if the accident has affected the plaintiffs disposition; or
25 specific; for example; if the plaintiff is no longer able to play sport.

26 Future loss of earnings. This head allows damages to be awarded where there is evidence that the
27 plaintiff is prevented from continuing to earn his/ her earn salary, on an ongoing basis.

28 Loss of earning capacity. This is sometimes referred to as damage for handicap on the labor
29 market, and applies where the plaintiff's salary is not affected, but his/ her future employment
30 prospects are not as good.

31 Loss of pension rights. This compensates the plaintiff for the loss of the the employer's
32 contribution towards his/ her fraud.

[PLEADING TITLE] - 3

1
2 Future expenses. This covers the fact that our of the pocket expenses are likely to be incurred in
3 the future. Limited Act 1950

4 Cease and Desist

5 UNITED PACIFIC COLLECTION AGENCY

6 1. Docomo Pacific Tamuning Guam, 96911
7 For the purchases of Company cell Phones (5) units
8 In the amounts of \$16, 750.00

9 COLLECTION AGENCY OF GUAM

10 2. S.D.A. Seven Day Adventist Clinic
11 For a Home Visit in the amount of \$15,265.47

12 3. Guam Memorial Hospital Bill
13 Guam Marians Collection Agency

14 4. I.T.E. Phone Company
15 In the amount of \$ 3,256.00

16 Penfed Federal Credit Union / UCAA

17 5. Gold Visa Credit Card
18 In the amount of \$1,956.00

19 DEMAND IS HEREBY MADE upon you pursuant to Washington D.C. Statues, for payment
20 within 7 days of your receipt of this notice, of that certain Judgement entered against you in the
21 above court.

22 Payment may be made through the undersigned.

23 PLEASE TAKE NOTE your failure to pay will result in future court proceeding.

24 MINIMUM TOTAL AMOUNT DUE: \$387 three hundred
25 Eighty seven Billion thousand dollars.

26 DATED: this day of 27 th September 2018.

27
28 _____
29 Plaintiff
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[PLEADING TITLE] - 4